

Remarks/Arguments

This Amendment has been prepared in response to the Office Action dated April 2, 2007, regarding the above-identified U.S. Regular Patent Application.

In that Action, the Examiner, noting that applicant's arguments filed in January of 2007 were persuasive to sustain a position of patentability of applicant's claims relative to the prior art which had theretofore been cited and applied against the claims in a prior Office Action, nevertheless has continued a rejection of the claims, in this most recent Action under 35 U.S.C. § 103(a) asserting that the only two claims presented for examination, claims 1 and 4, are unpatentable over U.S. Patent Application Publication No. 2002/0184494 in view of newly cited U.S. Patent No. 6,321,654 to Ishibashi.

Applicant has given a thoughtful review of this most recently received Office Action, has carefully considered the Examiner's arguments of non-patentability in view of the proposed combination of the two now cited and applied prior art references, has additionally carefully revisited the specification, claims and drawings in this case, and by the present Amendment, proposes certain current amendments in claims 1 and 4 which are believed to make the already otherwise claimed features of applicant's invention more clearly and understandably distinguishable from, and therefore patentable over, the Examiner's proposed combination of art. In comments made below, applicant points out precisely why it is that the Examiner's proposed combination of the two cited prior art documents cannot be construed to make obvious applicant's invention, and does this without in any way conceding that the Examiner's proposed combination of these two references is itself a proper combination under the recognized rules and

considerations that relate to the propriety of combining references under §103.

What the Examiner's rejection fails to recognize is that applicant's invention involves dealing with a stream of print-job data which is strikingly different in character from a stream of video data, such as that which the Examiner points to in the newly cited Ishibashi et al. reference -- a reference which the Examiner asserts supplies deficiencies in the previously cited Awadalla reference. In the print job data stream which is addressed by applicant's invention as claimed, that data stream has a special hierarchy which includes, at one level, both what is referred to in the art as (a) content command data and (b) non-content command data, and as a second level within the mentioned hierarchy, a union within the content command data of two different fields of data which are referred to and understood to be (a) content-fields portions and (b) non-content-fields portions. In accordance with applicant's invention, the practice thereof recognizes that two kinds of important segregation may be implemented with respect to this hierarchical data in order to effect an isolation, for encrypting purposes, of *only the content field portion, or portions*, of the content command data which itself is segmentable from the non-content command data.

Applicant's claims, while fully believed to be expressive directly of these considerations as presented before the entry of this Amendment, have nonetheless been currently amended by the present document to make even clearer the mentioned hierarchy of image job data, and the segmentable nature of that hierarchy which enables isolation for encrypting purposes of only the content-field portions of the content command data part of print-job data.

Video data, as described in the newly cited Ishibashi reference, does not possess

these qualities of plural-level hierarchy and segmentability, nor does anything which is set forth or suggested in the Ishibashi reference have anything to do with segmentation for isolated encryption purposes, of only a portion of the described video data stream which is properly analogizable to applicant's identified content-command *content-field-portion data*.

If one carefully follows the Examiner's analysis, and his attempt to assert (with believability) a similarity between (a) the data content of the video data stream which is dealt with in the Ishibashi reference and (b) the print job data stream which is dealt with by applicant's invention, one sees the Examiner suggesting that there is an equation between video I-frame image data and applicant's content-field portions of the described content command data. This analogy simply does not hold.

To be certain, the Ishibashi reference does describe encrypting only the I-frame image data, but in doing so, encryption actually takes place with respect to a collection of data which is analogous to the non-segmented entirety of applicant's referenced content command data rather than to applicant's referenced, and carefully segmented, content-field-only portion of content command data. Those who are skilled in the art with respect to understanding the kind of video data stream described in the Ishibashi reference recognize that the there-discussed I-frame data, or information, actually includes *two categories of information*, one of which categories relates to *pixel color-space information*, such as RGB information, which information truly is *content-field-only information*, and the other of which relates to column-and-row *pixel-position information* for individual pixels, which information is truly non-content-field information. In other words, the I-frame image information which is, in total, encrypted in accordance with

Ishibashi is actually data which includes unsegmented non-content field-type data as well as *content field type data*. Thus, encryption of the I-frame data in accordance with the cited Ishibashi reference is not an isolated form of encryption *which takes place with respect solely to content-field data portions only* of the overall video data stream.

There is, accordingly, no teaching or suggestion whatsoever in the Ishibashi et al. reference which mends the deficiency earlier pointed out respecting the Awadalla reference. In other words, the kind of segmentation and content field data isolation which is central to the practice of applicant's invention is completely missing from the cited and applied prior art, and as was stated earlier herein, even if one allows, for the sake of argument only, the propriety of the Examiner's proposed combination of references, that combination doesn't come close to creating a data encryption methodology like that claimed by applicant.

Accordingly, and for the reasons set forth above, and recognizing the effort which has been made in the present Amendment to state, with greater focus, the segmentation and encryption behavior of applicant's claimed invention in the currently amended claims, both claims now presented in this Application, on the basis of entry of the present Amendment, are plainly distinguishable over the cited and applied art of record, and are therefore patentable. For this reason, favorable reconsideration of this application, and allowance of both claims therein, are respectfully solicited. If the Examiner has any questions regarding the amendment or remarks, the Examiner is invited to contact Attorney-of-Record Jon M. Dickinson, Esq., at 503-504-2271.

Request for Extension of time in Which to Respond

Applicant(s) hereby request an Extension of Time Under 37 C.F.R. §1.136(a) for a

one-month extension. A PTO Form 2038 Credit Card authorization in the amount of \$120.00 is enclosed to pay the requisite extension fee. The Commissioner is hereby authorized to charge any additional fees which may be required, or credit any over-payment to Account No. 22-0258.

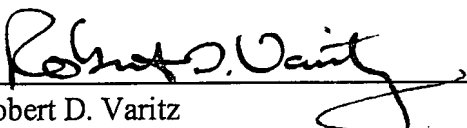
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Respectfully Submitted,

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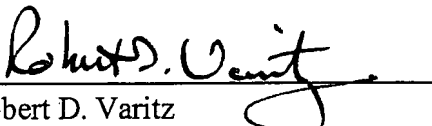
CERTIFICATE OF EXPRESS MAILING

"Express Mail" Mailing Label No.
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EM088408035US

I hereby certify that the attached RESPONSE TO OFFICE ACTION under 37 C.F.R. § 1.111, REQUEST FOR EXTENSION OF TIME UNDER 37 C.F.R. § 1.136 and a PTO Form 2038 credit card authorization in the amount of \$120.00 are being deposited with the United States Postal Service "Express Mail Post Office to Addressee" service under 37 C.F.R. 1.10 on the date indicated above and is addressed to:

Mail Stop Amendment
Commissioner for Patents
P.O. Box 1450
Washington, D.C. 22313-1450


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